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December 19, 2021

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

On behalf of our client, Ghislaine Maxwell, we respectfully submit this letter regarding the jury charge. We did not notice any errors in the Court's redline of the draft jury charge or the draft verdict sheet. We note that at the charge conference, the Court reserved decision on whether to slightly modify the language of Instruction No. 50: "Uncalled Witnesses – Equally Available to Both Sides" to take the emphasis off the word "equal." Tr. 2815:14 – 2817:16. We assume the Court has decided not to make those proposed edits. If that is incorrect, we renew our request for those edits.

We have also reviewed the government's letter regarding the jury charge (Dkt. 556). We do not object to the government's proposed edit to Instruction No. 19.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: Counsel of record